

EXHIBIT Z

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

DELTON GOODRUM,

Plaintiff,

V.

CITY OF ALEXANDRIA, a municipal
Corporation of Virginia,

Defendant.

[illegible]

Case 1:24-cv-01111-PTG-WEF

DEFENDANT'S INITIAL DISCLOSURES

As required by Federal Rule of Civil Procedure 26(a)(1), Defendant City of Alexandria makes the following initial disclosures. Defendant expressly reserves the right to supplement and/or amend these disclosures pursuant to Rule 26(e), and to introduce additional information in connection with any motion, hearing or trial as discovery proceeds. By making these disclosures, Defendant does not concede the admissibility of information disclosed.

I. Witness Disclosures

Listed below are individuals likely to have discoverable information – along with the subjects of that information – that Defendant may use to support its defenses, unless the use would be solely for impeachment. Consistent with the Federal Rules, Defendant has provided addresses and phone numbers where known.

A. Don Hayes

Last known address: 5447 Calhoun Ave., Alexandria, VA 22311
tel: (703) 888-0904

Former Chief of the Alexandria Police Department (“APD”). He likely has discoverable information regarding the promotions of Jerry Newcomb and Courtney Ballentine to Captain, the transfer of the Plaintiff, Lt. Goodrum, out of the Training and Recruitment

Section, the transfer of Lt. Downey into that Section, the temporary placement of Lt. Downey in an Acting Captain role, the Lieutenants' meeting mentioned in Paragraph 20 of the Amended Complaint, Plaintiff's 2020 performance evaluation, Plaintiff's 2021 and 2022 grievances, and the settlement agreement concerning the eligibility list for Captain.

B. Cpt. James Bridgeman

Alexandria City Police Department
3600 Wheeler Avenue
Alexandria, VA 22304
tel: (703) 746-6775

Plaintiff's former supervisor. Likely has discoverable information about Lt. Goodrum's 2022 grievance (mentioned in Paragraph 42 of the Amended Complaint), and Lt. Goodrum's job performance.

C. Ann McClure

Alexandria Office of Human Rights
123 N Pitt Street, Unit 230
Alexandria, VA 22314
tel: (703) 746-3146

Investigator, Alexandria Office of Human Rights. Likely has discoverable information about the subjects covered in the May 11, 2022 Administrative Inquiry Memorandum, including the Lieutenant's meeting and Lt. Goodrum's transfer out of the Training and Recruitment Section.

D. David Miller

Alexandria Office of Human Rights
123 N Pitt Street, Unit 230
Alexandria, VA 22314
tel: (703) 746-3146

Investigator, Alexandria Office of Human Rights. Likely has discoverable information about the subjects covered in the May 11, 2022 Administrative Inquiry Memorandum, including the Lieutenant's meeting and Lt. Goodrum's transfer out of the Training and Recruitment Section.

E. Jean Kelleher

Last known address: 422 Pitt St., Alexandria, VA 22314
tel: (703) 926-6383

Former Director, Alexandria Office of Human Rights. Likely has discoverable information about the subjects covered in the May 11, 2022 Administrative Inquiry Memorandum, including the Lieutenant's meeting and Lt. Goodrum's transfer out of the Training and Recruitment Section.

F. Michele McCarty

Alexandria City Police Department
3600 Wheeler Avenue
Alexandria, VA 22304
tel: (703) 350-9685

APD Division Chief, Support Services Division. Likely has discoverable information about Lt. Goodrum's 2022 performance review, Lt. Goodrum's job performance, the Captain selection process that began in about September 2020 ("Captain selection process"), and APD policies.

G. Sharntel Sutton

Last known address: 7215 Goblet Ct., Clinton, MD 20735
tel: (240) 281-6688

Former APD Division Chief HR. Likely has discoverable information about the Captain selection process, Lt. Goodrum's 2020 performance evaluation and his job performance, and APD policies.

H. Valerie Correa

Alexandria City Police Department
3600 Wheeler Avenue
Alexandria, VA 22304
tel: (703) 746-6642

Acting Division Chief, APD HR & Labor Relations. Likely has discoverable information about the APD's Human Resources policies.

I. Shannon Soriano

Last known address: 8152 Tall Timber Dr., Gainesville, VA 20155
tel: (571) 288-3119

Former APD Captain. Likely has discoverable information about the Captain selection process.

J. Janet K. Manuel

Last known address: 6041 Curtier Dr., Unit E, Alexandria, VA 22310
tel: (412) 225-5180

Former Chief HR Officer. Likely has discoverable information about the Captain selection process, the extension of the eligibility list in June 2023, Lt. Goodrum's 2022 grievance, and the City's HR policies.

K. Calvin Stover

7611 Maple Ave., Unit 509, Takoma, MD 20912
tel: (202) 288-2590

Former Employee and Labor Relations Manager for the City. Likely has discoverable information about the Captain selection process and the City's HR policies.

L. Shawnda H. Howard

PO Box 1951
Ashburn, VA 20146-1951
tel: (703) 858-5928

Former Chief Human Resources Officer. Likely has discoverable information about the 2020 selection process for Captain and the City's HR policies.

M. Michael L. Brown

P.O. Box 106, Gig Harbor, WA 98335
tel: (916) 753-4685

Former APD Chief. Likely has discoverable information about the 2020 Captain selection process.

N. Morris & McDaniel, Inc.

117 South Saint Asaph Street
Alexandria, VA 22313
tel: (703) 836-3600

Outside Vendor. Likely has discoverable information about the 2020 Captain selection process.

O. Mark Jinks, Former City Manager

Last known address: 316 Crown View Drive, Alexandria, VA 22314
tel: (703) 567-4884

Former Alexandria City Manager. Likely has discoverable information about the settlement agreement regarding the list of eligible candidates for Captain.

II. Document Disclosures

As required by Federal Rule of Civil Procedure 26(a)(1)(A)(ii), Defendant makes the following document disclosures regarding documents in their possession, custody and control that may be used to support its defenses, unless the use would be solely for impeachment. Defendant has identified these documents with the express reservation that they may supplement these disclosures in the future based upon additional information gathered through discovery and investigation.

Defendant identifies the following documents in its possession, custody and control that may be used to support its defenses: *See* documents Bates numbered: City.Docs.1 - 418.

The documents produced are provided without waiving in any manner the right to object to the use of any document for any purpose in this action or any other actions on the ground of privilege, relevance, materiality or any other appropriate grounds or the right to provide, correct, supplement or clarify the responses provided below at any time.

III. Computation of Damages Claimed

Not applicable, as the City claims no damages.

IV. Insurance Disclosure

There is no insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in this case or to indemnify or reimburse the City for payments made to satisfy the judgment.

Respectfully,

**THE CITY OF ALEXANDRIA, a Municipal
Corporation of Virginia**

By Counsel,

/s/

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Norfolk, Virginia 23502
Tel: 757-461-7100
Fax: 757-461-0083
Email: jcales@furnissdavis.com

Counsel for Defendant City of Alexandria

CERTIFICATE OF SERVICE

I certify that on this 12th day of September 2024, a copy of the foregoing was sent to the following by email:

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kherrmann@erlichlawoffice.com

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